

SEALED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**



UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

ZHI DONG,)

Defendant.)

Criminal Action No. 21-

57

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT ONE

On or about July 30, 2020, in the District of Delaware, the defendant, ZHI DONG, knowingly made a false statement and representation to StarQuest Shooters and Survival Supply, Inc., a licensee under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of StarQuest Shooters and Survival Supply, Inc., in that ZHI DONG executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, where he claimed that his current state of residence was Delaware and his current address was 107 Russell Lane, Newark, New Castle County, knowing that he did not reside at that address, in connection with the acquisition or attempted acquisition of the following firearms:

- a. One (1) CZ Shadow 2 9mm pistol with serial number D216676; and,
- b. One (1) CZ 75 Tactical Sport 9mm pistol with serial number D186038.

In violation of 18 U.S.C. § 924(a)(1)(A).

COUNT TWO

On or about July 31, 2020, in the District of Delaware, the defendant, ZHI DONG, knowingly made a false statement and representation to American Sportsman, LLC, a licensee under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of American Sportsman, LLC, in that ZHI DONG executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, where he claimed that his current state of residence was Delaware and his current address was 107 Russell Lane, Newark, New Castle County, knowing that he did not reside at that address, in connection with the acquisition or attempted acquisition of the following firearms:

- a. Four (4) CZ Shadow 2 9mm pistols with serial numbers D142876, D133809, D133839, and D193039;
- b. One (1) Maxim Defense PDX 5.56mm pistol with serial number MXM-18-11908;
- c. Two (2) STI Taran Tactical 9mm pistols with serial numbers TX12790 and TX15324;
- d. Four (4) IWI UZI 9mm pistols with serial numbers U2000634, U2000389, U2000460, and U2000595;
- e. Four (4) Sig Sauer P320X5 9mm pistols with serial numbers 58J030672, T60153846, T60153353, and T60153842;
- f. One (1) Sig Sauer P226 9mm pistol with serial number 47E049281; and
- g. One (1) Heckler and Koch SP5 9mm pistol with serial number 271-005636.

In violation of 18 U.S.C. § 924(a)(1)(A).

NOTICE OF FORFEITURE

Upon conviction of the offense alleged in Counts One and Two of this Indictment, the defendant, ZHI DONG, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d)(1) any firearm or ammunition involved in or used in the charged conduct, including, but not limited to:

- a. One (1) CZ Shadow 2 9mm pistol with serial number D216676;
- b. One (1) CZ 75 Tactical Sport 9mm pistol with serial number D186038;
- c. Four (4) CZ Shadow 2 9mm pistols with serial numbers D142876, D133809, D133839, and D193039;
- d. One (1) Maxim Defense PDX 5.56mm pistol with serial number MXM-18-11908;
- e. Two (2) STI Taran Tactical 9mm pistols with serial numbers TX12790 and TX15324;
- f. Four (4) IWI UZI 9mm pistols with serial numbers U2000634, U2000389, U2000460, and U2000595;
- g. Four (4) Sig Sauer P320X5 9mm pistols with serial numbers 58J030672, T60153846, T60153353, and T60153842;
- h. One (1) Sig Sauer P226 9mm pistol with serial number 47E049281; and
- i. One (1) Heckler and Koch SP5 9mm pistol with serial number 271-005636.

A TRUE BILL:



Foreperson

DAVID C. WEISS
UNITED STATES ATTORNEY

By: 
Ruth Mandelbaum
Assistant United States Attorney

Dated: August 12, 2021